

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

*In re: Clearview AI, Inc. Consumer Privacy
Litigation*

Civil Action File No.: 1:21-cv-00135

Judge Sharon Johnson Coleman

Magistrate Judge Maria Valdez

**DEFENDANTS' UNOPPOSED JOINT MOTION FOR EXTENSION OF TIME TO
ANSWER PLAINTIFFS' THIRD AMENDED COMPLAINT**

Defendants Clearview AI, Inc. (“Clearview”), Hoan Ton-That, Richard Schwartz, Rocky Mountain Data Analytics LLC (“Rocky Mountain”), and Thomas Mulcaire (collectively, the “Clearview Defendants”) and Defendants Macy’s, Inc., Macy’s Retail Holdings, Inc. (n/k/a Macy’s Retail Holdings, LLC), and Macy’s Corporate Services, Inc. (n/k/a Macy’s Corporate Services, LLC) (collectively, the “Macy’s Defendants”) and by and through their respective counsel, jointly move for a 30-day extension of time to file their respective answers or otherwise responsive pleadings to Plaintiffs’ Third Amended Complaint. In support of this Motion, Defendants state as follows:

1. As reported at the status hearing held on April 29, 2024, before the Honorable Sharon Johnson Coleman, the parties are in the process of finalizing a settlement agreement.
2. On May 13, 2024, in anticipation of Plaintiffs’ Motion for Preliminary Settlement Approval, Plaintiffs filed their Third Amended Complaint in this matter. The Third Amended Complaint substitutes the named Plaintiffs.
3. Clearview Defendants’ and Macy’s Defendants’ answers or otherwise responsive pleadings to Plaintiff’s Third Amended Complaint are due May 28, 2024.

4. In light of Plaintiffs' anticipated Motion for Preliminary Settlement Approval, Defendants require a brief extension of time of (30) days to answer or otherwise respond to Plaintiffs' Third Amended Complaint.

5. Defendants' have conferred with Plaintiffs and Plaintiffs do not oppose this request for an extension of time.

WHEREFORE, Defendants' respectfully request the Court grant their unopposed joint motion for extension of time and extend their responsive pleadings dates to June 27, 2024.

Dated: May 28, 2024

Respectfully submitted:

By: /s/ James Thompson
James Thompson (ARDC No. 6199621)
Daniel Lynch (ARDC No. 6202499)
LYNCH THOMPSON LLP
150 South Wacker, Suite 2600
Chicago, Illinois 60606
Phone: (312) 346-1600
jthompson@lynchthompson.com
dlynch@lynchthompson.com

Counsel for the Clearview Defendants

By: /s/ Daniel R. Saeedi
Daniel R. Saeedi (ARDC No. 6296493)
Rachel Schaller (ARDC No. 6306921)
Blank Rome LLP
444 W. Lake St., Suite 1650
Chicago, IL 60606
Phone: 312-776-2600
Daniel.Saeedi@blankrome.com
Rachel.Schaller@blankrome.com

Counsel for the Macy's Defendants

CERTIFICATE OF SERVICE

I, James Thompson, an attorney, hereby certify that, on May 28, 2024, I filed the foregoing document using the Court's CM/ECF system, which effected service on all counsel of record.

/s/James Thompson
James Thompson